

April 9, 2015

Via ECF

The Honorable Lorna G. Schofield
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***Thind v. Healthfirst, Inc.*, Civil Docket No. 14-9539 (LGS)**

Dear Judge Schofield:

Pursuant to the First Amended Civil Case Management Plan and Scheduling Order dated April 3, 2015, (ECF No. 28), we respectfully submit this joint letter on behalf of all parties to explain what discovery has taken place, what discovery remains and how the parties are acting diligently to meet the discovery deadline.

The parties have exchanged document requests and interrogatories. Responses to these are due on or before April 30, 2014. The parties expect to schedule depositions after service of responses to these discovery requests. Those depositions are currently scheduled to take place April 27-29, 2014.

Defendant's motion to dismiss will be fully briefed on April 10, 2015. Absent unforeseen circumstances, the parties expect to fully comply with Your Honor's current scheduling order.

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